From:

Sent:

Hutson, Nick [Hutson.Nick@epa.gov]

9/25/2018 12:04:41 PM

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Thompson, Lisa [Thompson.Lisa@epa.gov]
To:
             Re: Confirmed + Materials: Meeting with Theresa Pugh Consulting, LLC on OOOOa and ACE
Subject:
Lisa,
I'm not going to be able to attend this because it conflicts with the SPPD management mtg. Are you
planning to listen? If so, can you take notes and give me a debrief afterwards?
Nick
Sent from my iPhone
> On Sep 24, 2018, at 5:33 PM, Hambrick, Amy <Hambrick.Amy@epa.gov> wrote:
 UPDATED:
>
> Hi Amy: Here are the handouts/slides for your EPA staff for our call tomorrow.
                                                                                      The slides are in
PowerPoint but can be printed out as "paper slides". We hope that the ACE team and 0000a teams will stay
on the conference call for the entire call as the issues in two rulemakings are linked.
> Dial in: 1-919-541-1958
> No passcode
 Agenda:
 10:30 Self introductions
>
       EPA staff
>
       Theresa Pugh, Theresa Pugh Consulting, LLC: brief explanation as to why the two rules are
connected for dual fuel (oil and biomass), remaining useful life of plant, efficiency decisions, and
methane leaks
       Dave Fraley, MMUA (PE, PhD)
>
       Carrie Annand, Biomass Power Association
 Listening by phone if available: Bob Cleaves, President, Biomass Power Association, Portland, OR &
Mike Siefert (Missouri public power utilities)
> Presentations:
                    Dave Fraley: ACE (He has had computer problems today and will send paper later
> 10 minutes
today—his router died).
                      Carrie Annand: ACE and why biomass as compliance options matters (PowerPoint Biomass
> 10 minutes
& Carbon) (Two additional papers are offered for background).
                      Theresa Pugh: ACE and 0000a and why the two rules will be connected (highlights:
> 15 minutes
need for dual fuel permitting, methane leak repair time for compressor stations and pipelines serving
power plants using NERC study)
                                PowerPoint slides (paper slides) "EPA ACE 0000a Sept 2018 slides FINAL
> 11:30-12:00 ET Time for Q and A or discussion of follow up
> Thank you,
> Theresa
 Theresa Pugh Consulting, LLC
> 2313 North Tracy Street
> Alexandria, VA 22311
> 703-507-6843
> www.theresapughconsulting.com<a href="http://www.theresapughconsulting.com">http://www.theresapughconsulting.com</a>
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> All- Nick S. and I received a meeting request from Theresa Pugh to discuss the interface of 0000a and
ACE (details below). I am casting a wide net for the oil and gas team (forward to anyone I missed) with
the understanding that not everyone may be interested in attending but regardless I wanted to make sure
everyone was aware. Nick S., as we discussed, I'll leave it to you and Nick H. to forward this invite to
any additional team members on your end. Including Lisa because I am sure Theresa will be submitting a
comment letter to ACE docket. Note below and attached background of the oil and gas team's meeting with
Theresa last year. FYI - I don't think the meeting will take more than 1 hour, but scheduling a little
more time just in case and also for phone line/room logistics. Let me know if you have any questions.
> - natural gas issues that are relevant for NSPS 111(d) (new ACE proposed rule) and the EPA's next steps
on section OOOOa on methane for new (or existing) pipelines and compressor stations (T/S segment) serving
power sector and LDCs.
> - issues relevant to the "remaining useful life of the plant" and NERC's Nov 2017 study. I served on a
NERC study in the last year as an unpaid advisor on natural gas issues. There are 23 areas in the US
where more than one gas-fired power plants are served by only one pipeline with no redundancy in
transmission pipelines or the underground gas storage. That places some risk for force majeure for power
> - The link to the NERC study is
https://www.nerc.com/pa/RAPA/ra/Reliability%20Assessments%20DL/NERC_SPOD_11142017_Final.pdf
>
> From: Theresa Pugh [mailto:Pugh@theresapughconsulting.com]
> Sent: Thursday, August 23, 2018 6:07 PM
> To: Rakosnik, Delaney <rakosnik.delaney@epa.gov<mailto:rakosnik.delaney@epa.gov>>
> Cc: Hambrick, Amy <Hambrick.Amy@epa.gov<mailto:Hambrick.Amy@epa.gov>>
> Subject: Request for appointment: September 17 or 18 (or 19) in Raleigh re EPA-HQ-OAR-2017-0355
> Dear Ms Rakosnick:
> Bill gave me your e mail
> address. (I know him or would not refer to him with his first name). He seemed interested to learn more
about the cross-cutting issues between the two rulemakings.
> If you scroll down to see other e mail correspondence, I would like to coordinate a meeting with the
staff at headquarters and RTP working on BOTH the
> proposed ACE rulemaking and the upcoming methane 0000a reconsideration on new sources (or preparations
for existing source rule) for gas compressors and pipelines. (I believe Amy is the lead on that project).
> Below you will see my reach out to Amy H and Nick S to see if they are available on Sept 17 (after 2)
or on Sept 18-19 in RTP. If that doesn't work- happy to do at another Sept date but in DC and perhaps the
RTP staff can join by conference call/camera. I am not in RTP that often.
> I would need 30 Minutes and whatever time for Q and A to cover what is relevant for both rulemakings.
And I would like to use a power point slide deck to show some NERC slides and maps.
> Thank you,
> Theresa Pugh
> Theresa Pugh Consulting, LLC
  pugh@theresapughconsulting.com<mailto:pugh@theresapughconsulting.com>
> 703-507-6843
> www.theresapughconsulting.com<http://www.theresapughconsulting.com>
> Begin forwarded message:
> From: Theresa Pugh <Pugh@theresapughconsulting.com<mailto:Pugh@theresapughconsulting.com>>
> Date: August 23, 2018 at 5:52:52 PM EDT
 To: Clint Woods <woods.clint@epa.gov<mailto:woods.clint@epa.gov>>,
"swanson.nicholas@epa.gov<mailto:swanson.nicholas@epa.gov>
<swanson.nicholas@epa.gov<mailto:swanson.nicholas@epa.gov>>
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> Cc: Amy Hambrick <hambrick.amy@epa.gov<mailto:hambrick.amy@epa.gov>>
> Subject: Request for appointment: September 17 or 18 (or 19) EPA-HQ-OAR-2017-0355
> Dear Clint (and Nick),
> It dawned on me that you would probably be at the AAPCA meeting in Sept or perhaps be in RTP that week.
Please see the note below requesting an appointment. It is my hope to meet with you, Amy and Nick's groups
together. Please scroll down.
> I would make time to meet with all of you but hope your schedules make you available on Sept 17 after 2
or on Sept 18. I could make it Sept 19 if that is the only available time.
> My note to Nick and Amy is below. I accidentally mis-keyed Nick's email below.
> Thank you,
> Theresa Pugh
> Owner
> Theresa Pugh Consulting, LLC
 pugh@theresapughconsulting.com<mailto:pugh@theresapughconsulting.com>
> 703-507-6843
> From: <Pugh@theresapughconsulting.com<mailto:Pugh@theresapughconsulting.com>>
> Date: August 23, 2018 at 4:53:43 PM EDT
> To: Amy Hambrick <hambrick.amy@epa.gov<mailto:hambrick.amy@epa.gov>>,
<nick.swanson@epa.gov<mailto:nick.swanson@epa.gov>>
> Subject: Request for appointment: September 17 or 18
> Dear Amy and Nick
> Good afternoon. I will be in RTP in Sept for the AAPCA meeting and wondered if there is an opportunity
to meet with your staff regarding natural gas issues that are relevant for NSPS 111(d) (new ACE proposed
rule) and the EPA's next steps on section 0000a on methane for new (or existing) pipelines and compressor
stations serving power sector and LDCs.
> My clients are electric utilities and I have expertise with pipelines/compressor stations. I am active
with NERC (unpaid advisor).
> If possible, I would like to come in and see your staff (both 111d team and 0000a) in the next month on
some issues relevant to the "remaining useful life of the plant" and NERC's Nov 2017 study. I served on a
NERC study in the last year as an unpaid advisor on natural gas issues. There are 23 areas in the US
where more than one gas-fired power plants are served by only one pipeline with no redundancy in
transmission pipelines or the underground gas storage. That places some risk for force majeure for power
plants.
> NERC recommends that EPA and state agencies allow for a dual fuel approval in Title V permits when
voltage support or force majeure events occur- even if during ozone season. This shouldn't mean a carte
blanche to run oil units or create significant new ozone problems without justification. But NERC does
find 23 area (some geographically small) with electricity reliability problems - at least until more gas storage and pipelines are built. This issue is both relevant to ACE and 111(d)). It is also important
that those oil- fired or alternative fuel fired units meet all other relevant regulations including SPCC
(RCRA). Many dual fuel plants in the US outside of New England have not maintained the tanks or lack
sufficient footprint space to have more than 1-2 days of oil onsite.
> I will be at AAPCA meeting and will request to talk to Amy and Nick's group(s)- preferably together
since the issues meet for gas generators.
> The link to the NERC study is
> https://www.nerc.com/pa/RAPA/ra/Reliability%20Assessments%20DL/NERC_SPOD_11142017_Final.pdf
> I look forward to seeing you- either in RTP on Sept 17-18 or via camera phone at a call in
headquarters. I can easily go down to headquarters for a combination meeting. (I reached out to Wehrum
earlier today asking if he could join in).
> I am available on Sept. 17 at 3-5 (following a drive down from DC) or on Sept 18
> Thank you,
> Theresa Pugh
> Owner
> Theresa Pugh Consulting, LLC
> pugh@theresapughconsulting.com<mailto:pugh@theresapughconsulting.com>
> 703-507-6843
> www.theresapughconsulting.com<ahref="http://www.theresapughconsulting.com">http://www.theresapughconsulting.com</a>
> ~ a woman owned small business~
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> Sent from mobile device, please excuse typos.
> ADDITIONAL BACKGROUND FROM OOOOA MEETING LAST YEAR
> See attachment
> ----Original Appointment----
Marsh, Karen; Witt, Jon; Thompson, Lisa; Garwood, Gerri; Howard, Jodi; Dewees, Jason; Macpherson, Alex; Mills, Kathy; Miller, Elizabeth; Davis, Alison; Weitz, Melissa; DeFigueiredo, Mark; Waltzer, Suzanne;
Mia, Marcia; Carey, Angela
> Cc: Swanson, Nicholas; Culligan, Kevin; Ayres, Sara; Lischinsky, Robert
> Subject: CONFIRMED: meeting with Theresa Pugh Consulting (D201/X4332)
> When: Wednesday, September 20, 2017 1:00 PM-2:00 PM (UTC-05:00) Eastern Time (US & Canada).
> Where: RTP-D201-Max40/RTP-Bldg-D; RTP-OAQPS-919-541-4332-SPPD/Phone-Line/RTP-OAQPS-BLDG-C
> Added presentation in email attached for those who will be calling in.
> Discussion: interface between electric utilities and natural gas storage
>
> <EPA gas-electric Sept 2017 presentation.eml>
> <Biomass Carbon Study Findings One Pager May 2017.pdf>
> <Final BPA Khanna Dwivedi Biomass Carbon Study May 2017.pdf>
> <Biomass & Carbon 9.25.18.pptx>
> <EPA ACE 0000a Sept 2018slide presentation FINAL_.pptx>
> <meeting.ics>
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